## REMARKS

Claims 1-4, 6-17, 19 and 20 are pending. Claims 1, 8, 14 and 20 have been amended. Claims 5 and 18 have been cancelled. Claims 1, 14, and 20 are independent.

Claims 1-20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,347,307 (Sandhu).

Applicant submits that Sandhu does not anticipate amended claim 1 of the present application at least because claim 1 recites:

> A method for modeling a financial product, comprising the steps of:
>
> **displaying a palette of objects** for constructing a financial product;
>
> **displaying at least one window for graphically representing the financial product**; and
>
> **selecting objects from the palette** to construct the financial product;
>
> wherein **selecting the objects from the palette includes dragging the objects from the palette to the window**.

(emphasis added).

The claimed invention is thus directed to a software graphical user interface that displays a palette of tool objects which can be used to construct a representation of a financial product, and a window for displaying the constructed representation of the financial product. (See present application as published (US 2005/0060252 A1) at figures 2 and 3 and paragraphs [0015], [0016], [0020] and [0021]). A user can select objects from the palette of objects, and drag the objects from the palette to the window to form a representation of the financial product.

In stark contrast, Sandhu merely describes a system for conducting Web-based

transactions that includes converting XML objects to Java objects. (Sandhu at figure 17). Sandhu does describe that financial objects can be stored in the form of "object graphs." (Sandhu at column 48, lines 58-60). Separately, Sandhu also describes that "object mappings 1410 may be customized by the user." (Sandhu at column 48, lines 64-66). Sandhu does not describe, however, how object mappings would be customized by a user. Thus, Sandu does not describe or suggest "displaying a palette of objects for constructing a financial product," "displaying at least one window for graphically representing the financial product" and "selecting objects from the palette to construct the financial product" "wherein selecting the objects from the palette includes dragging the objects from the palette to the window," as recited by amended claim 1 of the present application. Sandhu does not describe or suggest the claimed palette of objects, nor dragging objects in to a window, as claimed by the present application.

While Sandhu does describe a system automatically generating a document object model (DOM) "tree" which maps to the object graphs of financial objects (Sandhu at column 49, lines 39-45), again, this generation of a DOM tree by Sandhu is very different from the claimed "displaying a palette of objects for constructing a financial product," "displaying at least one window for graphically representing the financial product" and "selecting objects from the palette to construct the financial product" "wherein selecting the objects from the palette includes dragging the objects from the palette to the window," as recited by amended claim 1 of the present application. The automated DOM generation of Sandhu does not teach or describe a graphical user interface that facilitates displaying objects that can be dragged to a window to create a representation of a financial product, as recited by claim 1 of the present application.

Accordingly, applicant submits that Sandhu does not teach or suggest each and every element of claim 1 of the present application, and applicant submits that claim 1 is

patentable over Sandhu.

Independent claims 14 and 20, while differing in form and scope from claim 1, recite features similar to those discussed above with respect to claim 1, and are thus deemed patentable over Sandhu for the reasons discussed above with respect to the patentability of claim 1.

Each of dependent claims 2-4, 6-13, 15-17 and 19 ultimately depend from one of claims 1 and 14, and are therefore patentable over Sandhu for at least the reasons discussed above with respect to claims 1 and 14.

Claims 5 and 18 have been cancelled, thus rendering moot the rejections to those claims.

Claim 8 has been amended to attend to a formalistic error.

Accordingly, applicant requests withdrawal of the rejections to claims 1-20 under 35 U.S.C. § 102(b).

In view of the foregoing, it is respectfully submitted that the currently-pending claims are in condition for allowance and favorable consideration is earnestly solicited.

Respectfully submitted,

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